

APPENDIX 3-B

CHECKLIST FOR UST CLOSURE

The following checklist may be used by the owners and operators to recognize standard UST closure procedures and to track progress of their consultants/contractors during closure activities. In order to properly close a UST permanently and comply with DOH requirements, owners and operators should refer to Section 3 of the Technical Guidance Manual and cited documentation.

Check boxes when complete

- ☐ 1. Provide DOH with preliminary written notification (letter or fax) of your intent to permanently close the tank system(s) to DOH at least 30 days prior to beginning tank closure activities (HAR 11-281-82(b)). The following information should be included:
 - ☐ a. Facility name and address of the UST to be permanently closed;
 - ☐ b. Name, title and telephone number of the person in charge at the facility;
 - ☐ c. Name, title, address and telephone number of the person with primary responsibility for overall coordination of the closure activity;
 - ☐ d. Name of the environmental consultant/contractor performing the tank removal, tank cleaning, and soil and water sampling/analysis activities. For each company identified, please provide a contact name, title and telephone number;
 - ☐ e. Description of each UST system(s) to be permanently closed (i.e., age, size, contents, material of construction); and
 - ☐ f. Date that the closure activity is scheduled to begin and expected completion date. DOH should be informed of any changes in the closure schedule.
- Note: At this time, UST owners and operators are not required to obtain prior "approval" from DOH in order to conduct permanent closure.
- ☐ 2. Contact the appropriate County Fire Department for regulations and/or procedures regarding UST closure. If you intend to close your UST system in-place, you must obtain approval from the County Fire Department prior to start of closure activities.
- ☐ 3. Obtain all other necessary permits for completing UST closure (i.e. excavation permit, land use permit, etc., see Section 2.3 for more details).



4. Provide DOH with a confirmatory notification of the exact date of the UST closure at least seven days before the closure activity occurs.



5. The UST system(s) must be emptied and cleaned by removing all liquids and accumulated sludges. All UST system(s) permanently taken out-of-service must be either removed from the ground or filled with an inert solid material (HAR 11-281-82(c)).



6. All unrecovered product, water, sludge, scale, etc., from the interior of a UST is presumed to be hazardous waste, according to the provisions of HAR 11-261-3(a) or HAR 11-261-3(b)(3) where benzene (D018) or lead (D008) are the most likely characteristic contaminants. This hazardous waste presumption may be rebutted by demonstrating (via chemical analysis) that the waste is not hazardous as defined in HAR Chapter 11-261.

Generators of hazardous waste are subject to 40 CFR Part 262 and HAR 11-262, which includes, but is not limited to, compliance with requirements of appropriate notification, containerization, and manifesting. In general, all hazardous waste must be manifested to a permitted or interim status hazardous waste treatment, storage, and disposal facility. In addition, transporters of hazardous waste are subject to the requirements of 40 CFR Part 263 and HAR 11-263. (Note: **Hawai`i's solid waste landfills are not permitted to accept hazardous waste.**)



7. The UST site must be evaluated for the presence of a release where contamination is most likely to have occurred before completing permanent closure (HAR 11-281-83(b)). Section 7 of this document provides general guidance on sampling procedures and analytical methods. Table 3.2 provides "Recommended Soil and Ground-water Sampling for Permanent Tank Closure." In addition, Table 7.1 provides "Recommended Sample Preparation and Analytical Methods."



8. Properly manage and dispose of the UST and associated piping, contaminated excavated soil, contaminated water and recovered free product (if any) in accordance with requirements outlined in Section 6 of this document.

9. Submit a completed and signed revision of DOH Form No. 1, "Notification for Underground Storage Tanks" (Appendix 3-C) for tanks brought into use before January 28, 2000. For tanks brought into use after January 28, 2000, owners and operators must submit a written notice pursuant to HAR 11-281-29 to DOH after completing the closure activity to reflect the status of the UST to DOH.





10. UST owners and operators must maintain records in accordance with HAR 11-281-85 that are capable of demonstrating compliance with the permanent UST closure requirements. In addition, the UST Closure Report ~~must~~ be maintained for at least 3 years after the completion of tank closure.



11. If a release from the UST is discovered during tank closure or in any manner, UST owners and operators must undertake actions in accordance with HAR 11-281, Subchapter 7 (See Section 5 of this document).